Dinsmôre

Legal Counsel.

DINSMORE & SHOHL LLP
101 South Fifth Street ^ Suite 2500 ^ Louisville, KY 40202
www.dinsmore.com

RECEIVED

JUN 2 1 2012

PUBLIC SERVICE COMMISSION

John E. Selent (502) 540-2315 (direct) ^ (502) 585-2207 (fax) john.selent@dinsmore.com

June 20, 2012

via Federal Express

Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
P. O. Box 615
Frankfort, KY 40601

Re: West Virginia PCS Alliance's Certification of Federal Universal Service

Funding for Eligible Telecommunications Carriers

in the Commonwealth of Kentucky, Administrative Case No. 381

Dear Mr. Derouen:

Enclosed for filing with the Public Service Commission of the Commonwealth of Kentucky (the "Commission") in the above-referenced case is one original and ten (10) copies of the Annual Certification of West Virginia PCS Alliance LC (d/b/a "NTELOS") Regarding Use of Federal Universal Service Support.

Please also note the enclosed additional copy of the document to be file-stamped. Please file-stamp the additional copy and return it to me in the enclosed, self-addressed, pre-paid envelope.

Thank you, and if you have any questions with regard to this matter, please call me.

Very truly yours,

DINSMORE & SHOHL LLP

John E Selent

JES:ksc Enclosures



COMMONWEALTH OF KENTUCKY

JUN 2 1 2012

PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION

Certification of Federal Universal)	
Service Funding for Eligible)	Administrative Case No. 381
Telecommunications Carriers in the)	
Commonwealth of Kentucky)	

ANNUAL CERTIFICATION OF WEST VIRGINIA PCS ALLIANCE (NTELOS) REGARDING USE OF FEDERAL UNIVERSAL SERVICE SUPPORT

West Virginia PCS Alliance (d.b.a. "NTELOS"), hereby submits the information requested by the Commission in Administrative Case No. 381 as well as the additional data requested in the NTELOS ETC Designation Order. NTELOS was granted Eligible Telecommunications Carrier designation in Kentucky on October 24, 2006 in Case 2006-00312. The Study Area Code (SAC) for NTELOS is 269010. NTELOS is a Non-Rural, Competitive carrier.

1) Certify that ETC will use universal service funds received in 2013 only for the provision, maintenance and upgrading of facilities and services for which such support is intended.

Included as Exhibit A is the Affidavit of Robert L. McAvoy certifying the use of the federal high cost support that will be received by NTELOS in 2013.

2) Provide progress reports on the ETC's five-year service quality improvement plan.

Attached as Exhibit B is the NTELOS five-year plan demonstrating the use of universal service support received for ETC designated areas in Kentucky. NTELOS received \$57,083 for 2011 high-cost universal service support for the Commonwealth of Kentucky.

3) Detail the number of requests for service from potential customers within its service areas that were unfulfilled for the past year.

NTELOS had no unfulfilled service requests in its service areas in 2011.

4) Detail the number of complaints per 1,000 handsets or lines;

For 2011, NTELOS had an average of 12.30 trouble tickets on a monthly basis per 1,000 customers.

John Selent

DINSMORE & SHOHL LLP

2500 National City Tower

101 South Fifth Street

Louisville KY 40202 (502) 540-2300

(502) 585-2207 (facsimile)

COUNSEL TO WEST VIRGINIA PCS ALLIANCE (NTELOS)

EXHIBIT A AFFIDAVIT OF ROBERT L. MCAVOY

AFFIDAVIT OF ROBERT L. MCAVOY IN SUPPORT OF WEST VIRGINIA PCS ALLIANCE, L.C.'s USE OF FEDERAL UNIVERSAL SERVICE SUPPORT

STATE OF VIRGINIA

CITY OF WAYNESBORO

I, Robert L. McAvoy, declare as follows:

- 1.) I am the <u>Senior Vice President Wireless</u> of <u>NTELOS Inc.</u> I am an officer of <u>West Virginia PCS Alliance, L.C.</u> and am authorized to give this affidavit on its behalf. This affidavit supports the Kentucky Public Service Commission's ("Commission") certification of the use of federal universal service funds for <u>2013</u> as required by 47 C.F.R. [§ 54.313/§ 54.314]. NTELOS anticipates receiving \$51,000 in high-cost support in 2013.
- 2.) Under 47 C.F.R. [§ 54.313/§ 54.314], the Commission is required to submit an annual certification to the Federal Communications Commission ("FCC") and the Universal Service Administrative Company ("USAC"), certifying that rural and non-rural incumbent local exchange carriers and/or eligible telecommunications carriers serving lines in the service area of a rural and non-rural incumbent local exchange carrier within the Commonwealth of Kentucky will use federal high-cost universal service support in a manner consistent with section 254(e) of the Telecommunications Act of 1996 (the "Act"), 47 U.S.C. § 254(e). Absent such certification, such carriers will not receive universal service support. In order for carriers to receive federal support beginning January 1 of each year, the Commission's certification must be filed with the FCC and USAC by October 1 of the preceding year.
- 3.) In Administrative Case 381, the Commission directed all carriers to file verified statements under which each carrier in the Commonwealth of Kentucky that is subject to the Commission's jurisdiction and eligible to receive federal high-cost universal service

support, must certify to the Commission that federal universal service support funds to be received by that carrier for the succeeding year will be used only for the provision, maintenance and upgrading of facilities and services for which such support is intended.

4.) NTELOS Inc. hereby certifies that any federal high-cost universal service support West Virginia PCS Alliance, L.C. receives in 2013 will be used for the services and functionalities outlined in 47 C.F.R. § 54.101(a), and that it will only use the federal high-cost support it receives for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with section 254(e) of the Act. NTELOS operates under Study Area Code (SAC) 269010 and is a Non-Rural, Competitive carrier.

FURTHER AFFIANT SAYETH NOT.

Senior Vice President- Wireless

NTELOS Inc.

Subscribed and sworn to before me this 8th day of June, 201762

My commission expires: ____

EXHIBIT B

NTELOS FIVE-YEAR BUILD PLAN

WEST VIRGINIA PCS ALLIANCE - 5-YEAR BUILDOUT PLAN IN KENTUCKY

			2012									_					
		2012 Signal Capacit	Capacit	2012	2013 Signal	2013	2013	2014 Signal	2014	2014	2015 Signal	nal 2015		2015	2016 Signal	2016	2016
Wire Center	Name	Quality	y	Coverage	Quality	Capacity	Coverage	Quality	O	Coverage	Quality	$\frac{\circ}{}$		Coverage	Ouality	Capacity	Coverage
ASLDKYXA	Ashland	80	\$18,908	\$671,129	80	\$26,751	\$159,193	So	1	\$158,938		18	L	\$158,713	So	\$23.832	\$158.548
CTBGKYXA	Catlettsburg	so	\$9,454	\$31,907	So	\$8,917	\$33,864	0\$		\$33,779		So	L	\$33,704	S	\$7.944	\$33,649
GNUPKYXA	Greenup	SO	\$9,454	\$31,907	80	\$8,917	\$33,864	0\$		\$33,779		\$0 S	\$8,193	\$33,704	80	\$7,944	\$33,649
GYSNKYXA	Grayson	\$0	\$18,908	\$63,815	80	\$17,834	\$67,729	\$0	\$17,062	\$67,559		\$0 \$16	\$16,386	\$67,409	80	\$15,888	\$67,299
RSSLKYXB	Russell	SO	\$18,908	\$318,729	80	\$26,751	\$108,793	0\$	\$25,593	\$108,538		\$0 \$25	\$24,579	\$108,313	\$0	\$23,832	\$108,148
SSHRKYXA	South Shore	80	\$18,908	\$49,415	\$0	\$17,834	\$53,329	\$0		\$53,159		S0 S1(L	\$53,009	\$0	\$15,888	\$52,899
MEDSKYXA	Meads	\$0	\$66,178	\$235,066	80	\$71,336	\$245,715	0\$	\$68,248	\$245,035		98 08	\$65,544	\$244,435	\$0	\$63,552	\$243,995
	Column Totals	\$0	\$160,718	\$0 \$160,718 \$1,401,967	\$0	\$178,340	\$702,488	0\$	\$170,620	\$700,788		\$0 \$163	Ş	\$699,288	0\$	\$158,880	\$698,188
	Yearly Totals			\$1,562,685			\$880,828			\$871,408			\$	\$863,148			\$827,068

Notes
1 - 2012 new coverage sites are budgeted and we are currently targeting activation by end of year.
2 - New sites beyond 2012 have not yet been approved

3 - Capacity dollars are estimates based on the need for additional channel cards and carriers. In reality dollars will probably shift between years and markets (for example, we may spend more in 2012 in the Ashland wire center than our estimate but less in Greenup and vice-versa in 2013).
4 - All capacity dollars are estimates and will vary based on actual usage and subscriber growth.
5 - 2014-2016 totals are dependent on 2012 growth and can/will fluctuate based on projects completed in 2013 or pushed to future years.